

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

)  
GREATBATCH LTD., )  
 )  
 )  
 Plaintiff, )  
 )  
 )  
 v. ) C.A. No. 13-723-LPS  
 )  
 )  
 AVX CORPORATION and )  
 )  
 AVX FILTERS CORPORATION, )  
 )  
 )  
 Defendants. )  
 )

**MOTION TO STRIKE EXPERT TESTIMONY  
CONTRARY TO THE COURT'S CLAIM CONSTRUCTION**

Defendants AVX Corporation and AVX Filters Corporation (together, “AVX”), by and through undersigned counsel, hereby move the Court for an order, substantially in the form attached hereto, striking those portions of the opinions and testimony of Greatbatch’s experts Keith Seitz, Steven M. Pilgrim, and Allyn D. Strickland that are inconsistent with the Court’s construction of the term “asymmetrical.” The grounds for this motion are set forth in the accompanying letter.

AVX avers that a reasonable effort has been made to reach agreement with Greatbatch Ltd. on the matters set forth in the motion, and that Greatbatch does not consent to the relief sought.

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Dated: October 12, 2018